

REMARKS

This Amendment is submitted in response to the Office Action dated March 3, 2006. In the Office Action, the Patent Office rejected Claims 1-61 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,154,211 to *Kamachi et al.*

With respect to the rejection of Claims 1-61 under 35 U.S.C. §102(b), Applicants amended Claims 1-60 and canceled Claim 54 and 61. Applicants submit that the amendments to Claims 1-60 overcome the rejection by the Patent Office. Notice to that effect is requested.

In the Office Action, the Patent Office rejected Claims 1-61 under 35 U.S.C. §102(b) as being anticipated by *Kamachi et al.* More specifically, the Patent Office alleges that:

Regarding Claim 1, *Kamachi et al.* teach said system comprising:

- a server host adapted to receive and store data representing the virtual reality environment and adapted to change, store and transmit said dynamic virtual reality data representing the virtual reality environment; and
- said client host adapted to communicate with at least one of the servers to obtain said data representing the location of the server host to locate the server host, and said client host adapted to receive said dynamic virtual reality data from the server host and to receive said static virtual reality data from one of the servers to access said virtual reality environment.

Regarding Claim 16, *Kamachi et al.* teach said method comprising the step of:

- establishing a network communication between the hosts to access the virtual reality environment wherein at least one of the hosts acts as a server host for transmitting dynamic

virtual reality data to at least one other host.

Regarding Claim 30, *Kamachi et al.* teach said method comprising the steps of:

- issuing a registration request from the host to the server;
- transmitting the registration request to at least one other server;
- determining the server nearest to the registering host and user;
- transmitting informational data from the host and user to the nearest located server; and
- updating at least one database associated with the nearest located server with the informational data.

Regarding Claim 32, *Kamachi et al.* teach said method comprising the steps of:

- issuing a location request from a host to a low level server;
- transmitting the location request from the low level server to at least one upper level server; and
- transmitting the location request from said upper level server to a plurality of other lower level servers until another host having a host name associated with the location request is located.

Regarding Claim 35, *Kamachi et al.* teach said method comprising the step of:

- continuing the network communication between the client host and the server host.

Regarding Claim 39, *Kamachi et al.* teach said method comprising the steps of:

- transmitting data representing a copy of the virtual reality environment from the server host to the client host;
- discontinuing the network communication between the client host and the server host; and
- activating the transmitted data representing a copy of the virtual reality environment at the client host.

Regarding Claim 41, *Kamachi et al.* teach said method comprising the steps of:

- redirecting the host to the session server other than the home session server if the logical distance between the host and the home session server is greater than the logical distance of at least one of the session

- server in network proximity to the host; and
- updating the home session server with informational data associated with redirecting the hosts.

Regarding Claim 42, *Kamachi et al.* teach said method comprising the steps of:

- moving the host to a session server other than home session server during a network expansion; and
- updating the home server with informational data associated with moving the host.

Regarding Claim 43, *Kamachi et al.* teach said method comprising the step of:

- establishing a continuous network communication between each of the hosts associated with the user group;

Regarding Claim 45, *Kamachi et al.* teach said host computer comprising:

- a data storage device which is adapted to store data representing the virtual reality environment and program code for accessing and displaying the virtual reality environment, said program code including means for storing data representing the virtual reality environment, means for executing a plurality of command to activate the virtual reality environment, means for running the virtual reality environment once activated, and means for enabling the host to establish network communications with at least one other host within the virtual reality environment.

Regarding Claim 49, *Kamachi et al.* teach said computer program product comprising:

- computer readable code means for executing a plurality of commands to activate the virtual reality environment;
- computer readable code means for running the virtual reality environment once activated;
- and

Claim 61 contains limitations that are substantially equivalent to claim 49 and is therefore rejected under the same basis.

Regarding Claim 53, *Kamachi et al.* teach data server comprising:

- means for transmitting the data representing the virtual reality environment to a host computer which receives the virtual data to establish a networked communication session with a plurality of other hosts within the

virtual reality environment.

Regarding Claim 56, *Kamachi et al.* teach said session server comprising:

- means for transmitting dynamic data representing the virtual reality environment between the hosts; and
- means for storing and transmitting informational data to locate the hosts.

Regarding Claim 60 contains limitations that are substantially equivalent to claim 1 and is therefore rejected under the same basis.

Independent Claim 1, as amended, requires a system having a client host obtains the data representing the location of the server host from at least one of the plurality of servers to to establish network communication with the server host. Further, Claim 1 requires that the client host connects to the server host via the network address of the server and receives the dynamic virtual reality data from the server host. Moreover, Claim 1 requires that the client host requests and receives the static virtual reality data from one of the servers to access the virtual reality environment.

Independent Claim 16, as amended, requires a method having the step of identifying the location of each of the plurality of hosts via the code assigned to each of the plurality of hosts. Further, Claim 16 requires that the informational data is accessed with at least one of the plurality of servers to determine the network location of each of the plurality of hosts. Moreover, Claim 16 requires that the client host accesses the dynamic virtual reality data received from the server host and obtains the static virtual reality data which corresponds to the dynamic virtual reality data

received from the server host.

Independent Claim 30, as amended, requires a method having the step of assigning unique identifiers to the host and to the host owner user not yet registered with the system. Further, Claim 30 requires that the unique identifier identifies the home session server for the host and a numeric code of the host within a home session server local database. Still further, Claim 30 requires the step of transmitting host owner user informational data from the host to the home session server wherein the host owner user information data may optionally comprise a unique user identifier of a registered user. Moreover, Claim 30 requires that the unique user identifier is indicative of a location of a primary host owned by the registered user wherein the host being registered becomes a secondary host owned by the registered user.

Independent Claim 32, as amended, requires a method having the step of issuing a location request from a first host to a first low level server wherein the first host is connected to the low level server via a network wherein the low level server is representative of a first geographical region. Further, Claim 32 requires the step of transmitting the location request from the low level server to at least one upper level server which is representative of a second geographical region wherein the second geographical region is a larger geographical region than the first geographical region wherein the first host is connected to at least one upper level server via the network. Moreover, Claim 32 requires the step of

transmitting the location request from at least one upper level server to a plurality of second lower level servers which are connected to a plurality of second hosts wherein each of the plurality of second hosts have a host name until the name of one of the plurality of second hosts corresponds to the location request of the first host.

Independent Claim 35, as amended, requires a method having the step of maintaining the network communication between the client host and the server host wherein the network communication between the client host and the server host is continuous and uninterrupted as the client host obtains the static virtual reality data.

Independent Claim 39, as amended, requires a method having the step of transmitting a copy of the dynamic virtual reality data from the server host to the first client host via the network communication. Further, Claim 39 requires the step of activating the data representative of the virtual reality environment with the first client host wherein the first client host obtains the static virtual reality data corresponding to the dynamic virtual reality data.

Independent Claim 41, as amended, requires a method having the step of redirecting the host to one of the plurality of session servers if the first logical distance between the host and the home session server is greater than the second logical distance of one of the plurality of session servers. Moreover, Claim 41 requires the step of updating the home session server with informational

data wherein the informational data identifies the one of the plurality of session servers which is connected to the host via the network communication.

Independent Claim 42, as amended, requires a method having the step of moving the host to a second session server wherein the network is expanded to include the second session server wherein a second logical distance separates the second session server and the host wherein the second logical distance is less than the first logical distance. Moreover, Claim 42 requires the step of updating the first session server with informational data wherein the informational data identifies the second session server and the second logical distance between the host and the second session server.

Independent Claim 43, as amended, requires a method having the step of establishing a continuous network communication between each of the hosts of the user group wherein the continuous network communication between each of the hosts of the user group is uninterrupted during activation of the teleporter. Moreover, Claim 43 requires identifying a second virtual reality environment wherein the user group is transferred to the second virtual reality environment via the teleporter.

Independent Claim 45, as amended, requires wherein the host computer activates the dynamic virtual reality data and obtains a first portion of the static virtual reality data from the server and a second portion of the static virtual reality data from the

data storage device of the host computer.

Independent Claim 49, as amended, requires a computer program product having computer readable code means which identifies the static virtual reality data necessary to activate the virtual reality environment from the dynamic virtual reality data. Moreover, Claim 49 requires the computer readable code means obtains the static virtual reality data and activates the virtual reality environment with the static virtual reality data and the dynamic virtual reality data.

Independent Claim 53, as amended, requires a data server having means for transmitting the static virtual reality data representing the virtual reality environment to a first host computer which receives the virtual reality data to establish a networked communication session with one or more second host computers within the virtual reality environment.

Independent Claim 56, as amended, requires a session server having means for transmitting dynamic data representing the virtual reality environment between the plurality of hosts via the session server wherein the session server connects to each of the plurality of hosts. Moreover, Claim 56 requires that the informational data identifies a network location of each of the plurality of hosts wherein the session server is assigned to each of the plurality of hosts wherein the domain name of the session server corresponds to the location of each of the plurality of hosts.

Independent Claim 60, as amended, requires a networked

computer system having means for receiving the dynamic virtual reality data from the server host via a session server assigned to the client host and means for receiving static data representing the virtual reality environment from the data server.

Kamachi et al. merely disclose that a sight line of an avatar can be set to a direction independent of a direction in which the avatar moves in a virtual reality space. Buttons are provided for setting the sight line of the avatar to the direction independent of the direction in which the avatar moves in the virtual reality space. Processing for changing sight line directions allows the avatar to walk on the ground while looking up to prevent unnatural display or unnatural avatar movement. Moreover, changing sight line directions allow the avatar to walk and to look up while the avatar moves in the direction of its sight line which may be eventually raised away from the ground.

Nowhere do *Kamachi et al.* disclose a client host that obtains the data representing the location of the server host from at least one of the plurality of servers to establish network communication with the server host as required by Claim 1. Further, nowhere do *Kamachi et al.* disclose that the client host connects to the server host via the network address of the server and receives the dynamic virtual reality data from the server host as required by Claim 1. Moreover, nowhere do *Kamachi et al.* disclose that the client host requests and receives the static virtual reality data from one of the servers to access the virtual reality environment as required

by Claim 1.

Nowhere do *Kamachi et al.* disclose the step of identifying the location of each of the plurality of hosts via the code assigned to each of the plurality of hosts as required by Claim 16. Further, nowhere do *Kamachi et al.* disclose that the informational data is accessed with at least one of the plurality of servers to determine the network location of each of the plurality of hosts as required by Claim 16. Moreover, nowhere do *Kamachi et al.* disclose that the client host accesses the dynamic virtual reality data received from the server host and obtains the static virtual reality data which corresponds to the dynamic virtual reality data received from the server host as required by Claim 16.

Nowhere do *Kamachi et al.* disclose the step of determining a home session server from the plurality of session servers wherein the home session server is determined from the network address of the host and the network address of each of the plurality of session servers as required by Claim 30. Further, nowhere do *Kamachi et al.* disclose the step of the host owner user information data may optionally comprise a unique user identifier of a registered user as required by Claim 30.

Nowhere do *Kamachi et al.* disclose the step of issuing a location request from a first host to a first low level server wherein the low level server is representative of a first geographical region as required by Claim 32. Further, nowhere do *Kamachi et al.* disclose the step of transmitting the location

request from the low level server to at least one upper level server which is representative of a second geographical region as required by Claim 32. Moreover, nowhere do *Kamachi et al.* disclose that the second geographical region is a larger geographical region than the first geographical region wherein the first host is connected to at least one upper level server via the network as required by Claim 32.

Nowhere do *Kamachi et al.* disclose the step of maintaining the network communication between the client host and the server host wherein the network communication between the client host and the server host is continuous and uninterrupted as the client host obtains the static virtual reality data as required by Claim 35.

Nowhere do *Kamachi et al.* disclose the step of transmitting a copy of the dynamic virtual reality data from the server host to the first client host via the network communication as required by Claim 39. Further, nowhere do *Kamachi et al.* disclose the step of activating the data representative of the virtual reality environment with the first client host wherein the first client host obtains the static virtual reality data corresponding to the dynamic virtual reality data as required by Claim 39.

Nowhere do *Kamachi et al.* disclose the step of redirecting the host to one of the plurality of session servers if the first logical distance between the host and the home session server is greater than the second logical distance of one of the plurality of session servers wherein the network communication is established

between the host and one of the plurality of session servers as required by Claim 41. Moreover, nowhere do *Kamachi et al.* disclose the step of updating the home session server with informational data wherein the informational data identifies the one of the plurality of session servers which is connected to the host via the network communication as required by Claim 41.

Nowhere do *Kamachi et al.* disclose the step of moving the host to a second session server wherein the network is expanded to include the second session server wherein a second logical distance separates the second session server and the host wherein the second logical distance is less than the first logical distance as required by Claim 42. Moreover, Nowhere do *Kamachi et al.* disclose the step of updating the first session server with informational data wherein the informational data identifies the second session server and the second logical distance between the host and the second session server as required by Claim 42.

Nowhere do *Kamachi et al.* disclose the step of establishing a continuous network communication between each of the hosts of the user group wherein the continuous network communication between each of the hosts of the user group is uninterrupted during activation of the teleporter as required by Claim 43. Moreover, nowhere do *Kamachi et al.* disclose the step of identifying a second virtual reality environment wherein the user group is transferred to the second virtual reality environment via the teleporter as required by Claim 43.

Nowhere do *Kamachi et al.* disclose host computer activates the dynamic virtual reality data and obtains a first portion of the static virtual reality data from the server and a second portion of the static virtual reality data from the data storage device of the host computer as required by Claim 45.

Nowhere do *Kamachi et al.* disclose a computer program product having a computer readable code means which identifies the static virtual reality data necessary to activate the virtual reality environment from the dynamic virtual reality data as required by Claim 49. Moreover, nowhere do *Kamachi et al.* disclose that the computer readable code means obtains the static virtual reality data and activates the virtual reality environment with the static virtual reality data and the dynamic virtual reality data as required by Claim 49.

Nowhere do *Kamachi et al.* disclose a data server having means for transmitting the static virtual reality data representing the virtual reality environment to a first host computer which receives the virtual reality data to establish a networked communication session with one or more second host computers within the virtual reality environment as required by Claim 53.

Nowhere do *Kamachi et al.* disclose means for transmitting dynamic data representing the virtual reality environment between the plurality of hosts via the session server wherein the session server connects to each of the plurality of hosts as required by Claim 56. Moreover, nowhere do *Kamachi et al.* disclose that the

informational data identifies a network location of each of the plurality of hosts wherein the session server is assigned to each of the plurality of hosts as required by Claim 56.

Nowhere do *Kamachi et al.* disclose means for receiving the dynamic virtual reality data from the server host via a session server assigned to the client host and means for receiving static data representing the virtual reality environment from the data server as required by Claim 60.

Therefore, *Kamachi et al.* do not disclose the structural elements and novel steps required by independent Claims 1, 16, 30, 32, 35, 39, 41, 42, 43, 45, 49, 53, 56 and 60, as amended.

Under 35 U.S.C. §102(b), anticipation requires that a single reference discloses each and every element of Applicants' claimed invention. *Akzo N.V. v. U.S. International Trade Commission*, 808 F.2d 1471, 1479, 1 USPQ 2d. 1241, 1245 (Fed. Cir. 1986). Moreover, anticipation is not shown even if the differences between the claims and the reference are "insubstantial", and one skilled in the art could supply the missing elements. *Structure Rubber Products Co. v. Park Rubber Co.*, 749 F.2d. 707, 716, 223 USPQ 1264, 1270 (Fed. Cir. 1984).

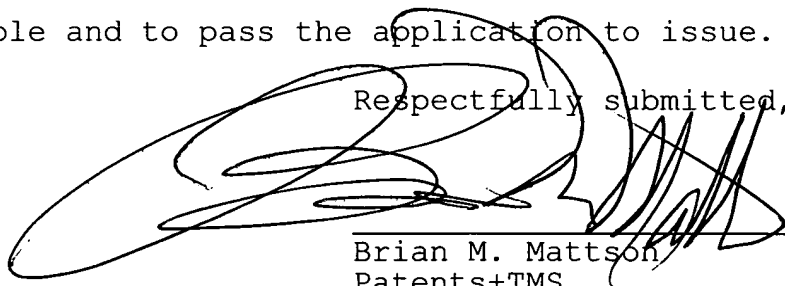
Since *Kamachi et al.* fail to disclose the structural elements and novel steps specifically defined in amended independent Claims 1, 16, 30, 32, 35, 39, 41, 42, 43, 45, 49, 53, 56 and 60, Applicants assert that the rejection of Claims 1-61 under 35 U.S.C. §102(b) has been overcome and should be withdrawn. Notice to that

effect is requested.

Claims 2-15 depend from Claim 1; Claims 17-29 depend from Claim 16; Claim 31 depends from Claim 30; Claims 33 and 34 depend from Claim 32; Claims 36-38 depend from Claim 35; Claim 40 depend from Claim 39; Claim 44 depends from Claim 43; Claims 46-48 depend from Claim 45; Claims 50-52 depend from Claim 49; Claims 54 and 55 depend from Claim 53; and Claims 57-59 depend from Claim 56. These claims are further believed allowable over the references of record since each sets forth additional structural elements and novel steps of Applicants' invention.

In view of the foregoing remarks and arguments, Applicants respectfully submit that all of the claims in the application are in allowable form and that the application is in condition for allowance. If, however, any outstanding issues remain, Applicants urge the Patent Office to telephone Applicants' attorney so that the same may be resolved and the application expedited to issue. Applicants' request the Patent Office to indicate all claims as allowable and to pass the application to issue.

Respectfully submitted,



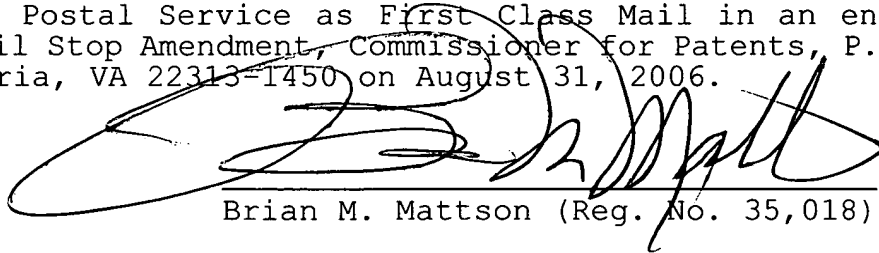
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